

EXHIBIT 8

Page 1

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2 UNITED STATES DISTRICT COURT

3 NORTHERN DISTRICT OF ILLINOIS

4 EASTERN DIVISION

5 Civil No. 1:17-cv-02246

6 DOROTHY FORTH, LISA BULLARD, RICARDO

7 GONZALES, CYNTHIA RUSSO, INTERNATIONAL

8 BROTHERHOOD OF ELECTRICAL WORKERS

9 LOCAL 38 HEALTH AND WELFARE FUND,

10 INTERNATIONAL UNION OF OPERATING

11 ENGINEERS LOCAL 295-295C WELFARE

12 FUND, AND STEAMFITTERS FUND LOCAL 439,

13 On Behalf of Themselves and All

14 Others Similarly Situated,

15 Plaintiffs,

16 -against-

17 WALGREEN CO.,

18 Defendant.

19 September 17, 2020

20 11:36 a.m.

21 *** HIGHLY CONFIDENTIAL ***

22 *** ATTORNEYS' EYES ONLY ***

23 Virtual Videotaped 30(b)(6)
24 Deposition of BRIAN CORREIA, taken by
25 Plaintiffs, pursuant to Notice, before
Sharon Pearce, RMR, CRR, CRC, NYRCR, a
Registered Merit Reporter, Certified
Realtime Reporter, and Notary Public of
the State of New York.

Page 2

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2 A P P E A R A N C E S:

3

4 SCOTT + SCOTT, ATTORNEYS AT LAW, LLP
5 Attorneys for Plaintiffs and
6 Putative Class
7 The Helmsley Building
8 230 Park Avenue
9 17th Floor
10 New York, New York 10169
11 (212) 223-6444

12

13 BY: CAREY ALEXANDER, ESQ.
14 JOSEPH GUGLIELMO, ESQ.
15 ERIN GREEN COMITE, ESQ.
16 calexander@scott-scott.com
17 jguglielmo@scott-scott.com
18 ecomite@scott-scott.com

19

20 REED SMITH
21 Attorneys for Defendant Walgreens
22 10 South Whacker Drive
23 Suite 4000
24 Chicago, Illinois 60606
25 (312) 207-1000

26

27 BY: MICHAEL LEIB, ESQ.
28 ANTHONY R. TODD, ESQ.
29 MICHAEL PERKINS, ESQ.
30 mleib@reedsmith.com
31 atodd@reedsmith.com
32 mperkins@reedsmith.com

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34

35

36

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Page 3

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2 A P P E A R A N C E S (Cont'd)

3

4 WILLIAMS & CONNOLLY LLP

5 Attorneys for Third-Party

6 Witness, Caremark LLC

7 725 12th Street NW

8 Washington, DC 20005

9 (202) 434-5000

10

11 BY: GRANT GEYERMAN, ESQ.

12 ggeyerman@wc.com

13

14

15

16

17

18 ALSO PRESENT:

19

20 MATT ALLISON, Videographer

21

22 HILARY BURN DUDLEY, ESQ.,

23

24 Caremark in-house counsel

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1 CORREIA - HIGHLY CONFIDENTIAL - AEO

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21 Q. So if Walgreens' retail price
22 for a drug was \$15, and its PSC price was
23 \$10, it would still report its U&C as the
24 \$15, but it would let you know that its
25 PSC price was \$10, and then you could

1 CORREIA - HIGHLY CONFIDENTIAL - AEO
2 change your MAC price to be \$10; is that
3 correct?

4 A. Yeah. What we found out was
5 that the FEP MAC prices were already lower
6 than the clear majority of any of the club
7 price programs that were out there. So
8 the incremental value for this endeavor
9 was very minimal. There might have been
10 some leaders that some of the club
11 programs had. But it didn't amount to
12 anything in the aggregate.

13 Q. But my hypothetical was correct,
14 though.

15 A. Yes. That's correct.

16 Q. And in fact, the whole point of
17 this provision, this -- under the generic
18 drug section, the whole point of this
19 provision was because you knew that
20 Walgreens was not reporting its PSC prices
21 as its U&C prices; correct?

22 A. Correct.

23 Q. And if we can look at Tab T now,
24 which we'll mark as Exhibit 364.

25 MR. PERKINS: Tab T or Tab S?

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2 CERTIFICATION

3

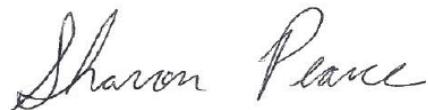
4 I, SHARON PEARCE, RMR, CRR, CRC,
5 NYRCR, a Notary Public for and within the
6 State of New York, do hereby certify:

7 That the witness whose testimony as
8 herein set forth, was duly sworn by me;
9 and that the within transcript is a true
10 record of the testimony given by said
11 witness.

12 I further certify that I am not
13 related to any of the parties to this
14 action by blood or marriage, and that I am
15 in no way interested in the outcome of
16 this matter.

17 IN WITNESS WHEREOF, I have hereunto
18 set my hand this 30th day of September,
19 2020.

20



21

22

SHARON PEARCE

23

RMR, CRR, CRC, NYRCR

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